

EXHIBIT A

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

JASON VERIABO,

Plaintiff,

vs.

ALLY FINANCIAL, INC.,

Defendant.

CIVIL DIVISION

ELECTRONICALLY FILED

Case No. GD-20-012346

COMPLAINT IN CIVIL ACTION

Filed on Behalf of Plaintiff:
Jason Veriabo

Counsel of Record for This Party:

J. P. WARD & ASSOCIATES, LLC

Joshua P. Ward
Pa. I.D. No. 320347

John V. Moore
Pa. I.D. No. 87333

The Rubicon Building
201 South Highland Avenue
Suite 201
Pittsburgh, PA 15206

Telephone: (412) 545-3015
Fax: (412) 540-3399
E-mail: jward@jpward.com

NOTICE TO DEFEND

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. If you do not have a lawyer, go to or telephone the office set forth below. This office can provide you with information about hiring a lawyer. **IF YOU CANNOT AFFORD TO HIRE A LAWYER**, this office may be able to provide you with information about agencies that may offer legal service to eligible persons at a reduced fee or no fee:

LAWYER REFERRAL SERVICE
11TH FLOOR KOPPERS BUILDING,
436 SEVENTH AVENUE
PITTSBURGH, PENNSYLVANIA 15219
TELEPHONE: (412) 261-5555

HEARING NOTICE YOU HAVE BEEN SUED IN COURT. The above Notice to Defend explains what you must do to dispute the claims made against you. If you file the written response referred to in the Notice to Defend, a hearing before a board of arbitrators will take place in the Compulsory Arbitration Center. Report to the Arbitration Assembly Room, Courtroom Two, Seventh Floor City-County Building, 414 Grant Street, Pittsburgh, Pennsylvania 15219, on _____, 2022 at 9:00 A.M.

IF YOU FAIL TO FILE THE RESPONSE DESCRIBED IN THE NOTICE TO DEFEND, A JUDGMENT FOR THE AMOUNT CLAIMED IN THE COMPLAINT MAY BE ENTERED AGAINST YOU BEFORE THE HEARING. DUTY TO APPEAR AT ARBITRATION HEARING IF ONE OR MORE OF THE PARTIES IS NOT PRESENT AT THE HEARING, THE MATTER MAY BE HEARD AT THE SAME TIME AND DATE BEFORE A JUDGE OF THE COURT WITHOUT THE ABSENT PARTY OR PARTIES. THERE IS NO RIGHT TO A TRIAL DE NOVO ON APPEAL FROM A DECISION ENTERED BY A JUDGE.

NOTICE: You must respond to this complaint within twenty (20) days or a judgment for the amount claimed may be entered against you before the hearing. If one or more of the parties is not present at the hearing, the matter may be heard immediately before a judge without the absent party or parties. There is no right to a trial de novo on appeal from a decision entered by a judge.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

JASON VERIABO,

CIVIL DIVISION

Plaintiff,

ELECTRONICALLY FILED

vs.

Case No. GD-20-012346

ALLY FINANCIAL, INC.,

Defendant.

COMPLAINT IN CIVIL ACTION

AND NOW, comes Plaintiff, Jason Veriabo, by and through the undersigned counsel, J.P. Ward & Associates, LLC and, specifically, Joshua P. Ward, Esquire, who files the within Complaint in Civil Action against Defendant Ally Financial Inc., of which the following is a statement:

PARTIES

1. Plaintiff, Jason Veriabo (hereinafter “Jason Veriabo”), is an adult individual who currently resides at 207 N. Bishop Avenue, Clifton Heights, Pennsylvania 19018.
2. Defendant, Ally Financial Inc., (hereinafter “Ally Financial”), is a corporation with its principal place of business located at 500 Woodward Avenue, Detroit, Michigan 48226.

JURISDICTION AND VENUE

3. Jurisdiction is proper as Plaintiff brings this lawsuit under the Fair Credit Reporting Act (“FCRA”), 15 U.S.C.A. § 1681, *et seq.*
4. Venue is proper pursuant to Pa.R.C.P. 2179(a)(2) because Defendant regularly conducts business in Allegheny County, Pennsylvania and because Defendant is subject to general jurisdiction of Allegheny County, Pennsylvania.

PROCEDURAL HISTORY AND FACTUAL ALLEGATIONS

5. On October 18, 2018, Ally Financial, filed a Civil Complaint against Jason Veriabo in Magisterial District Court at Docket Number: MJ-32252-CV-0000254-2018. A true and correct copy of the Docket is attached hereto, made a part hereof, and marked as Exhibit “A”.

6. In response to the aforesaid lawsuit, Jason Veriabo engaged The Law Firm of Fenters Ward n/k/a J.P. Ward & Associates, LLC for representation.

7. On November 19, 2019, The Law Firm of Fenters Ward served Ally Financial with a letter, (hereinafter, the “First Dispute Letter”) wherein Ally Financial was informed of the disputed nature regarding the alleged debt and that Jason Veriabo was represented by counsel. A true and correct copy of the First Dispute Letter is attached hereto, made a part hereof, and marked as Exhibit “B”.

8. This First Dispute Letter stated that Jason Veriabo “denie[d] owing Ally Financial Inc. any amount of money” and informed Ally Financial that Jason Veriabo disputed any and all “Debts” Ally Financial claimed to possess. See Exhibit “B”.

9. “Debts” as defined within the First Letter of Dispute delineated and included “any related debt(s) and/or credit account(s) your company [Ally Financial] claims to have, sold, purchased and/or assigned from yourself, another creditor, debt buyer or other entity as of the date of this letter. See Exhibit “B”.

10. Furthermore, Ally Financial was directed to cease and desist from contacting Jason Veriabo directly. See Exhibit “B”.

11. On November 19, 2018, The Law Firm of Fenters Ward filed an Entry of Appearance and an Intent to Defend on Jason Veriabo’s behalf. True and correct copies of the

Entry of Appearance and Notice of Intent to Defend are attached hereto, made a part hereof, and marked as Exhibit “C”.

12. On December 12, 2018, a Civil Action Hearing was held before the Honorable Kelly A. Micozzie-Aguirre, Magisterial District Judge. See Exhibit “A”.

13. On December 12, 2018, at the conclusion of the Civil Action hearing, Judge Kelly A. Micozzie-Aguirre granted a DEFAULT JUDGMENT FOR DEFENDANT in favor of Jason Veriabo and against Ally Financial. A true and correct copy of the Notice of Judgment is attached hereto, made a part hereof, and marked as Exhibit “D”.

14. On January 14, 2019, Ally Financial’s appeal period expired, making Judge Kelly A. Micozzie-Aguirre’s judgment a final judgment: rendering the alleged debt extinguished and unenforceable.

15. On September 16, 2019, The Law Firm of Fenters Ward sent Notices of Dispute of Trade Line letters to Equifax, Experian, and TransUnion regarding the trade line associated with the aforementioned alleged and extinguished debt. True and correct copies of the letters are attached hereto, made a part hereof, and marked as Exhibit “E”.

16. On October 12, 2019, Ally Financial willfully caused false and inaccurate information about Jason Veriabo to be furnished to Transunion when Ally Financial reported the alleged and extinguished debt as “REMARKS: DISP INVG. COMP-CONSUM DIASGRS; >SETTLED-LESS THAN FULL BLNC<; >PAID IN FULL/ WAS A CHARGE OFF<” in violation of § 1681s-2b(1)(E)(ii) of the FCRA. A true and correct copy of the trade line is attached hereto, made a part hereof, and marked as Exhibit “F”.

17. On October 12, 2019, Ally Financial willfully caused false and inaccurate information about Jason Veriabo to be furnished to Equifax and Transunion when Ally Financial

failed to remove the trade line pertaining to the alleged and extinguished debt: in violation of § 1681s-2(b)(1)(E)(ii) of the FCRA.

COUNT I
VIOLATIONS OF THE FCRA, 15 U.S.C.A. § 1681, *et seq.*

18. Plaintiff incorporates the allegations contained in the paragraphs, above, as if fully set forth at length herein.

19. Jason Veriabo is a “consumer” as defined by § 1681a(c) of the FCRA. 15 U.S.C.A. § 1681a(c).

20. Ally Financial are “persons” as defined by § 1681a(b) of the FCRA. 15 U.S.C.A. § 1681a(b).

21. Section 1681s-2(b)(1) of the FCRA provides:

After receiving notice pursuant to section 1681i(a)(2) of this title of a dispute with regard to the completeness or accuracy of any information provided by a person to a consumer reporting agency, the person shall: (A) conduct an investigation with respect to the disputed information;

(B) review all relevant information provided by the consumer reporting agency pursuant to section 1681i(a)(2) of this title; (C) report the results of the investigation to the consumer reporting agency; (D) if the investigation finds that the information is incomplete or inaccurate, report those results to all other consumer reporting agencies to which the person furnished the information and that compile and maintain files on consumers on a nationwide basis; and (E) if an item of information disputed by a consumer is found to be inaccurate or incomplete or cannot be verified after any reinvestigation under paragraph (1), for purposes of reporting to a consumer reporting agency only, as appropriate, based on the results of the reinvestigation promptly--(i) modify that item of information; (ii) delete that item of information; or (iii) permanently block the reporting of that item of information.

15 U.S.C.A. § 1681s-2(b)1.

22. On September 16, 2019, The Law Firm of Fenters Ward sent Notices of Dispute of Trade Line letters to Equifax, Experian, and TransUnion regarding the trade line associated with the aforementioned alleged and extinguished debt. See Exhibit “E”.

23. On October 12, 2020, Ally Financial willfully caused false and inaccurate information about Jason Veriabo to be furnished to Transunion when Ally Financial reported the alleged and extinguished debt as “REMARKS: DISP INVG. COMP-CONSUM DIASGRS; >SETTLED-LESS THAN FULL BLNC<; >PAID IN FULL/ WAS A CHARGE OFF<” in violation of § 1681s-2b(1)(E)(ii) of the FCRA. See Exhibit “F”.

24. Ally Financial failed to delete the trade line associated with the alleged and extinguished debt upon its extinguishment and unenforceability and failure to do so violated § 1681s-b(1)(E)(ii). This failure comes after a notification of its duty to do so under § 1681i(a)(2).

25. Section 1681n(a) of the FCRA provides:

Any person who willfully fails to comply with any requirement imposed under this subchapter with respect to any consumer is liable to that consumer in an amount equal to the sum of--(1)(A) any actual damages sustained by the consumer as a result of the failure or damages of not less than \$100 and not more than \$1,000; or (B) in the case of liability of a natural person for obtaining a consumer report under false pretenses or knowingly without a permissible purpose, actual damages sustained by the consumer as a result of the failure or \$1,000, whichever is greater; (2) such amount of punitive damages as the court may allow; and (3) in the case of any successful action to enforce any liability under this section, the costs of the action together with reasonable attorney's fees as determined by the court.

15 U.S.C.A. § 1681n(a).

26. As a direct and proximate result of Ally Financial’s violations of § 1681s-2(b)(1)(E) of the FCRA, Jason Veriabo has suffered annoyance, anxiety, embarrassment, emotional distress, and severe inconvenience.

WHEREFORE, Plaintiff, Jason Veriabo, respectfully requests that this Honorable Court enter judgment in their favor and against Defendant, Ally Financial Inc., and enter an award of monetary damages as described herein, not in excess of arbitration limits, including an award for actual damages, statutory damages pursuant to 15 U.S.C.A. § 1681n(a), costs and attorney's fees pursuant to 15 U.S.C.A. § 1681n(a), and such other and further relief as this Honorable Court deems just and proper.

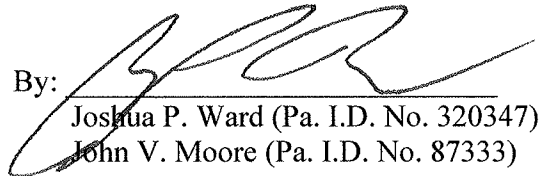
JURY TRIAL DEMANDED UPON APPEAL OR REMOVAL.

Respectfully submitted,

J. P. WARD & ASSOCIATES, LLC

Date: February 11, 2022

By:



Joshua P. Ward (Pa. I.D. No. 320347)
John V. Moore (Pa. I.D. No. 87333)

The Rubicon Building
201 South Highland Avenue
Suite 201
Pittsburgh, PA 15206

Counsel for Plaintiff

VERIFICATION

I, JOSHUA P. WARD, ESQ., have read the foregoing COMPLAINT and verify that the statements therein are correct to the best of my personal knowledge, information, and/or belief. I have gained this information from discussions with Plaintiff. This verification is made on behalf of Plaintiff. Plaintiff will produce their verification if/when there is an objection by Defendant or upon directive from the court.

I understand that this verification is made subject to the penalties of 18 Pa. C.S.A. 4904 relating to unsworn falsification to authorities, which provides that if I knowingly make false averments, I may be subject to criminal penalties.

Respectfully submitted,

J.P. WARD & ASSOCIATES, LLC

Date: February 11, 2022

By: 

Joshua P. Ward (Pa. I.D. No. 320347)
John V. Moore (Pa. I.D. No. 87333)

The Rubicon Building
201 South Highland Avenue
Suite 201
Pittsburgh, PA 15206

Counsel for Plaintiff

EXHIBIT A

Magisterial District Judge 32-2-52**DOCKET**

Docket Number: MJ-32252-CV-0000254-2018

Civil Docket

ALLY FINANCIAL INC.

v.

Jason Veriabo

Page 1 of 2

CASE INFORMATION

<u>Judge Assigned:</u>	Kelly A. Micozzie-Aguirre	<u>File Date:</u>	10/18/2018
<u>Claim Amount:</u>	\$7,731.28	<u>Case Status:</u>	Closed
<u>Judgment Amount:</u>		<u>County:</u>	Delaware

CALENDAR EVENTS

<u>Case Calendar</u>	<u>Schedule</u>	<u>Start Time</u>	<u>Room</u>	<u>Judge Name</u>	<u>Schedule</u>
<u>Event Type</u>	<u>Start Date</u>				<u>Status</u>
Civil Action Hearing	12/05/2018	1:00 pm		Kelly A. Micozzie-Aguirre	Scheduled

CASE PARTICIPANTS

<u>Participant Type</u>	<u>Participant Name</u>	<u>Address</u>
Defendant	Veriabo, Jason	Clifton Heights, PA 19018
Plaintiff	ALLY FINANCIAL INC.	DETROIT, MI 48226

DISPOSITION SUMMARY

<u>Docket Number</u>	<u>Plaintiff</u>	<u>Defendant</u>	<u>Disposition</u>	<u>Disposition Date</u>
MJ-32252-CV-0000254-2018	ALLY FINANCIAL INC.	Jason Veriabo	Default Judgment for Defendant	12/12/2018

ATTORNEY INFORMATION**Private**

Name: Brian J Fenters, Esq.
Representing: Veriabo, Jason
Counsel Status: Active - Entry of Appearance
Supreme Court No.: 320202
Phone No.: 412-545-3016
Address: 201 S Highland Ave
 Ste 201
 Pittsburgh, PA 15206
Entry of Appearance Filed Dt: 11/19/2018
Withdrawal of Entry of Appearance Filed Dt:

Private

Name: Attorney Michael F. Ratchford, Esq.
Representing: ALLY FINANCIAL INC.
Counsel Status: Active - Entry of Appearance
Supreme Court No.: 086285
Phone No.: 570-558-5510
Address: Ratchford Law Group, PC
 409 Lackawanna Ave Suite 320
 Scranton, PA 18503
Entry of Appearance Filed Dt: 10/19/2018
Withdrawal of Entry of Appearance Filed Dt:

DOCKET ENTRY INFORMATION

<u>Filed Date</u>	<u>Entry</u>	<u>Filer</u>	<u>Applies To</u>
12/12/2018	Default Judgment for Defendant	Magisterial District Court 32-2-52	Jason Veriabo, Defendant
11/19/2018	Entry of Appearance Filed	Brian J Fenters, Esq.	Jason Veriabo, Defendant
11/19/2018	Intent to Defend Filed	Jason Veriabo	Jason Veriabo, Defendant
10/19/2018	Restricted Certified Civil Action Hearing Notice Issued	Magisterial District Court 32-2-52	Jason Veriabo, Defendant
10/19/2018	Entry of Appearance Filed	Attorney Michael F. Ratchford, Esq.	ALLY FINANCIAL INC., Plaintiff
10/18/2018	Civil Complaint Filed	ALLY FINANCIAL INC.	

MDJS 1200

Printed: 12/12/2018 5:33 pm

Recent entries made in the court filing offices may not be immediately reflected on these docket sheets. Neither the courts of the Unified Judicial System of the Commonwealth of Pennsylvania nor the Administrative Office of Pennsylvania Courts assumes any liability for inaccurate or delayed data, errors or omissions on these docket sheets. You should verify that the information is accurate and current by personally consulting the official record reposing in the court wherein the record is maintained.

Magisterial District Judge 32-2-52

DOCKET

Docket Number: MJ-32252-CV-0000254-2018

Civil Docket

ALLY FINANCIAL INC.

v.

Jason Veriabo

Page 2 of 2

EXHIBIT B



THE LAW FIRM OF
FENTERS WARD
A I M T O W I N

201 SOUTH HIGHLAND AVE., SUITE 201
PITTSBURGH, PA 15206

BRIAN FENTERS, ESQ.
JOSHUA WARD, ESQ.

MANAGING PARTNERS

412-545-3016 OFFICE
412-540-3399 FAX

November 19, 2018

Ally Financial Inc.
c/o Attorney Michael F. Ratchford, Esq.
Ratchford Law Group, PC
409 Lackawanna Avenue, Suite 320
Scranton, PA 18503

Sent via U.S. Mail

Re: Our Client: JASON VERIABO
Docket Number: MJ-32252-CV-0000254-2018
Account #'s: xxx

To Whom It May Concern:

Please accept this letter as confirmation of my representation of **JASON VERIABO** with a current address of **207 N Bishop Ave. Clifton Heights, PA 19018**. My representation of the above-mentioned client includes any related debt(s) and/or credit account(s) your company claims to have, sold, purchased and/or assigned from yourself, another creditor, debt buyer or other entity as of the date of this letter (the "Debts"). Please cease and desist any further communications with my client as it relates to the collection of Debts.

According to my client, your company has been reporting the above-referenced accounts to collection and/or credit agencies. My client denies owing **Ally Financial Inc.** any amount of money and demands proof of liability, accounting and ownership of these alleged accounts. The proof shall include any agreements and any amendments thereto, any other written or signed documents agreed to by my client, as well as, a complete history of billing statements reflecting how you calculated the current amount claimed, owed, reported to the collection and/or credit agencies and complete copies of any assignment documentation evidencing your ownership rights to the specific accounts.

Pursuant to the Consumer Financial Protection Act (CFPA) 12 U.S.C. 5533(a) and the Fair Debt Collection Practices Act (FDCPA) 15 U.S.C. § 1692 et seq. we request that you provide additional documents related to the Debt you claim is owed by our client:

1. the original account-level documentation reflecting all purchases, payments, or other actual uses of the account;
2. a document signed by our client evidencing the opening of the account forming the basis for the debt;
3. the name of the creditor at the time of charge-off, including the name under which the creditor did business with our client;

4. the last four digits of the account number associated with the debt at the time our client's last monthly account statement, or, if not available, at the time of charge-off; the charge-off balance;
5. ALLY FINANCIAL, INC. method of calculating any amount claimed in excess of the charge-off balance;
6. a copy of the statement where ALLY FINANCIAL INC. offered to provide our client (within 30 days of a written request) with copies of a document signed by our client evidencing the opening of the account forming the basis for the debt; and the original account-level documentation reflecting a purchase, payment, or other actual use of the account.

Please be advised that at all times relative hereto, we are disputing this debt under the FDCPA, FCEUA and/or the UTPCPL. **AS SUCH YOU MUST 1) NOTIFY ANY CRAs YOU HAVE FURNISHED INFORMATION TO THAT THIS TRADE LINE IS DISPUTED; 2) UPON DISMISSAL OF THE CASE, OR DISCHARGE, CEASE AND DESIST COLLECTION ATTEMPTS OR REPORTING THIS DEBT TO CREDIT AGENCIES.** You may direct the requested proof to my office at the address listed above. **YOU HAVE THIRTY (30) DAYS TO PROVIDE THE REQUESTED PROOFS.** All future correspondence or contact shall be directed to my office until my office provides written confirmation of termination of legal representation, if such termination should ever occur. **YOU MUST PROVIDE THIS NOTICE TO ANY ASSIGNEE, TRANSFEREE OR SUBSEQUENT OWNER OF THIS OR ANY DEBT. IF YOU FAIL IN ANY OF THESE REGARDS, YOU WILL BE SUBJECT TO LIABILITY UNDER FEDERAL AND STATE CONSUMER PROTECTION LAWS.**

Very Truly Yours,

/s/ Joshua P Ward, Esq.

Joshua P. Ward, Esq.
Direct Dial: (412) 545-3015
Email: jward@fentersward.com

JPW/mh
cc: JASON VERIABO

Firm Mailing Book For Accountable Mail

UNITED STATES
POSTAL SERVICE®

Address of Sender

Check type of mail or service

- ☐ Adult Signature Required
☐ Adult Signature Restricted Delivery
☐ Certified Mail
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery (COD)
☐ Insured Mail
☐ Priority Mail
- ☐ Priority Mail Express
☐ Registered Mail
☐ Return Receipt for Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

USPS Tracking/Article Number

Addressee (Name, Street, City, State, & ZIP Code™)

 Affix Stamp Here
 (for additional copies of this receipt).
 Postmark with Date of Receipt.

USPS Tracking/Article Number	Addressee (Name, Street, City, State, & ZIP Code™)	Postage	(Extra Service) Fee	Handling Charge	Actual Value if Registered	Insured Value	Due Sender if COD	ASR Fee	ASRD Fee	RD Fee	RR Fee	SC Fee	SCRD Fee	SH Fee
3. Jason Verimbo CV-254 1st dispute letter	ALLY FINANCIAL INC. c/o M. Ratchford Esq. Ratchford Law Group PC. 409 Lackawanna Ave Ste. 320 Scranton, PA 18503			Handling Charge - if Registered and over \$50,000 in value				Adult Signature Required	Adult Signature Restricted Delivery	Restricted Delivery	Return Receipt	Signature Confirmation	Signature Confirmation Restricted Delivery	Special Handling
4.														
5.														
6.														
7.														
8.														

 Total Number of Pieces Listed by Sender: 3877
 Total Number of Pieces Received at Post Office: 3877

Postmaster, Per (Name of receiving employee)

 Complete in Ink
 S. R. R.

PS Form 3877, January 2017 (Page 1 of 2)

PSN 7530-02-000-9098

Complete in Ink

Privacy Notice: For more information on USPS privacy policies, visit usps.com/privacypolicy.

EXHIBIT C

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF: Delaware

ENTRY OF APPEARANCE
PURSUANT TO Pa.R.C.P.M.D.J. NO. 207.1(A)

Magisterial District Number:

32-2-52

MDJ Name: Hon. Kelly A. Micozzie-Aguirre

Address: 409 Ashland Ave. Suite 1
Secane, PA 19018

Telephone: (610) 622-8102

SENT VIA: Fax: 610-622-8105

DATE: 11/19/2018

PLAINTIFF:

NAME and ADDRESS

ALLY FINANCIAL, LLC

VS.

DEFENDANT:

NAME and ADDRESS

Jason Veriabo

Docket No.: MJ-32252-0000254-18

Date Filed: 10/18/2018



TO THE MAGISTERIAL DISTRICT COURT:

Please enter my appearance on behalf of Defendent Jason Veriabo
in the above captioned matter.

Attorney Name: Brian J. Fenters

Supreme Court of Pennsylvania Attorney Identification Number: 320202

Firm Name: The Law Firm of Fenters Ward

Address: 201 South Highland Ave., Suite 201

City, ST, ZIP: Pittsburgh, PA 15206

Telephone Number: 412-545-3016



THE LAW FIRM OF
FENTERS WARD
A I M T O W I N

201 SOUTH HIGHLAND AVE., SUITE 201
PITTSBURGH, PA 15206

BRIAN FENTERS, ESQ.
JOSHUA WARD, ESQ.

MANAGING PARTNERS

412-545-3016 OFFICE
412-540-3399 FAX

November 19, 2018

Magisterial District Number: 32-2-52

Honorable Kelly A. Micozzie-Aguirre

409 Ashland Ave. Suite 1

Secane, PA 19018

610-622-8102

Sent via: Fax 610-622-8105

RE: CV-254-2018. ALLY FINANCIAL, INC. v Jason Veriabo

INTENT TO DEFEND NOTICE:

DEFENDANT INTENDS TO ENTER A DEFENSE. PLEASE CONSIDER THIS NOTICE PER
Pa. R. Civ. P. MAG DIST J RULE 305(4)(a).

PLEASE NOTIFY THE PLAINTIFF THAT DEFENDANT HAS ENTERED NOTICE TO
DEFEND PER Pa. R. Civ. P. MAG DIST J RULE 318.

ALSO, PLEASE UPDATE THE DOCKET TO SHOW THAT DEFENDANT INTENDS TO
DEFEND AS WELL AS OUR ENTRY OF APPEARANCE.

Sincerely,

/s/ Brian Fenters

Brian J. Fenters, Esq.
bfenters@fentersward.com

PA Bar# 320202
412-545-3016

BF/mh

CC: Jason Veriabo

EXHIBIT D

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF DELAWARENOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE

Mag. Dist. No: MDJ-32-2-52
 MDJ Name: Honorable Kelly A. Micozzie-Aguirre
 Address: 409 Ashland Avenue
 Secane, PA 19018
 Telephone: 610-622-8102

ALLY FINANCIAL INC.

v.

Jason Veriabo

Brian J Fenters, Esq.
 201 S Highland Ave
 Ste 201
 Pittsburgh, PA 15206

Docket No: MJ-32252-CV-0000254-2018
 Case Filed: 10/18/2018

Disposition Details

Disposition Summary (cc - Cross Complaint)

<u>Docket No</u>	<u>Plaintiff</u>	<u>Defendant</u>	<u>Disposition</u>	<u>Disposition Date</u>
MJ-32252-CV-0000254-2018	ALLY FINANCIAL INC.	Jason Veriabo	Default Judgment for Defendant	12/12/2018

Comments:

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

12/12/18

Date

Kelly A. Micozzie-Aguirre

Magisterial District Judge Kelly A. Micozzie-Aguirre



I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

Date

Magisterial District Judge



ALLY FINANCIAL INC.

v.

Jason Veriabo

Docket No.: MJ-32252-CV-0000254-2018

Participant List

Private(s)

Brian J Fenters, Esq.
201S Highland Ave
Ste 201
Pittsburgh, PA 15206

Attorney Michael F. Ratchford, Esq.
Ratchford Law Group, PC
409 Lackawanna Ave Suite 320
Scranton, PA 18503

Plaintiff(s)

ALLY FINANCIAL INC.
500 Woodward Ave
DETROIT, MI 48226

Defendant(s)

Jason Veriabo
207 N Bishop Ave
Clifton Heights, PA 19018



EXHIBIT E



THE LAW FIRM OF
FENTERS WARD
A I M T O W I N

201 SOUTH HIGHLAND AVE., SUITE 201
PITTSBURGH, PA 15206

BRIAN FENTERS, ESQ.
JOSHUA WARD, ESQ.

MANAGING PARTNERS

~~412-545-3016~~ OFFICE
412-540-3399 FAX

SEPTEMBER 16, 2019

SENT VIA FIRST CLASS MAIL

EQUIFAX
P.O. Box 740241
ATLANTA, GA 30374

RE: FCRA — NOTICE OF DISPUTED TRADE LINE - 15 U.S.C.A. 1681i (A)(2).

NAME: JASON VERIABO
ADDRESS: 207 N BISHOP AVENUE
CLIFTON HEIGHTS, PA 19018
DOB: [REDACTED]
SSN: [REDACTED]
FURNISHER: ALLY FINANCIAL - \$7,731.28

TO WHOM IT MAY CONCERN:

PLEASE BE ADVISED THAT THE LAW FIRM OF FENTERS WARD REPRESENTS THE ABOVE-NAMED CLIENT, AS ATTORNEY-IN-FACT, AND DULY AUTHORIZED AGENT, WITH RESPECT TO A DEBT-COLLECTION LAWSUIT. THIS LETTER SHALL SERVE AS FORMAL NOTIFICATION OF THE CONSUMER'S DISPUTE OF THE ASSOCIATED TRADE LINE REFERENCED IN THE SUBJECT LINE HEREINABOVE.

WE HAVE NOTIFIED THE CREDITOR AND/OR FURNISHER OF THIS DISPUTE NOTICE, AND HAVE DISPUTED THE VALIDITY OF THE OBLIGATION IN ITS ENTIRETY WITH THE FURNISHER/CREDITOR.

AS A CREDIT REPORTING AGENCY, YOU MUST AGAIN NOTIFY THE FURNISHER OF THE DISPUTE. BE ADVISED THAT WE EXPECT TO PREVAIL IN THE UNDERLYING LAWSUIT, AND OBTAIN A FINAL COURT ORDER RENDERING THE ALLEGED OBLIGATION UNENFORCEABLE, INVALID, AND NON-EXISTENT. THEREFORE, THE FURNISHER HAS A DUTY TO REMOVE THE TRADE LINE FROM OUR CLIENT'S CREDIT REPORT AT THAT TIME. SHOULD THE FURNISHER FAIL TO REMOVE THE TRADE LINE, WE WILL FILE A CIVIL LAWSUIT AGAINST THE FURNISHER, PURSUANT TO 15 U.S.C.A. §§ 1681s-2(b), 1681(n) AND (o).

KINDLY NOTIFY THE FURNISHER OF THE CONSUMER'S DISPUTE PURSUANT TO 15 U.S.C.A. 1681i (A)(2). THANK YOU FOR YOUR ANTICIPATED COOPERATION IN THIS MATTER.

VERY TRULY YOURS,

JOSHUA P. WARD, ESQUIRE
JWARD@FENTERSWARD.COM
(412) 545-3015

JPW/CAF



THE LAW FIRM OF
FENTERS WARD
A I M T O W I N

201 SOUTH HIGHLAND AVE., SUITE 201
PITTSBURGH, PA 15206

BRIAN FENTERS, ESQ.
JOSHUA WARD, ESQ.

MANAGING PARTNERS

412-545-3016 OFFICE
412-540-3399 FAX

SEPTEMBER 16, 2019

SENT VIA FIRST CLASS MAIL

EXPERIAN
P.O. Box 2002
ALLEN, TX 75013

RE: FCRA — NOTICE OF DISPUTED TRADE LINE - 15 U.S.C.A. 1681i (A)(2).

NAME: JASON VERIABO
ADDRESS: 207 N BISHOP AVENUE
CLIFTON HEIGHTS, PA 19018
DOB: [REDACTED]
SSN: [REDACTED]
FURNISHER: ALLY FINANCIAL - \$7,731.28

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FENTERS WARD
A I M T O W I N

201 SOUTH HIGHLAND AVE., SUITE 201
PITTSBURGH, PA 15206

BRIAN FENTERS, ESQ.
JOSHUA WARD, ESQ.

MANAGING PARTNERS

412-545-3016 OFFICE
412-540-3399 FAX

SEPTEMBER 16, 2019

SENT VIA FIRST CLASS MAIL

TRANSUNION
P.O. Box 1000
CHESTER, PA 19022

RE: FCRA — NOTICE OF DISPUTED TRADE LINE - 15 U.S.C.A. 1681i (A)(2).

NAME: JASON VERIABO
ADDRESS: 207 N BISHOP AVENUE
CLIFTON HEIGHTS, PA 19018
DOB: [REDACTED]
SSN: [REDACTED]
FURNISHER: ALLY FINANCIAL - \$7,731.28

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VERY TRULY YOURS,

JOSHUA P. WARD, ESQUIRE
JWARD@FENTERSWARD.COM
(412) 545-3015

JPW/CAF

A circular postmark from East Liberty, Pittsburg, Pa. The text "EAST LIBERTY" is at the bottom, "PITTSBURG" is at the top, and "PA." is on the right. The date "MAY 15 1906" is in the center.

Affix Stamp Here
(for additional copies of this receipt).
Postmark with Date of Receipt.

09/16/2019

Check type of mail or service	
<input type="checkbox"/> Adult Signature Required	<input type="checkbox"/> Priority Mail Express
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail
<input type="checkbox"/> Certified Mail	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation
<input type="checkbox"/> Collect on Delivery (COD)	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Insured Mail	
<input type="checkbox"/> Priority Mail	

Address (Name, Street, City, State, & ZIP Code™)

TRANSLATION, LLC
P.O. BOX 1000
CHESTER, PA 19022

EQUIFAX INFORMATION SERVICES, INC.
P.O. BOX 740241
ATLANTA, GA 30374

EXPERIAN INFORMATION SERVICES, LLC
P.O. BOX 2002
ALLEN, TX 75013

[illegible]

Total Number of Pieces Listed by Sender	2	Total Number of Pieces Received at Post Office	614	Postmaster, Per (Name of receiving employee)	S. Roberts
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IRS Form 3877, January 2011 (Page 1 of 2)

Complete in Ink

Privacy Notice: For more information on USPS privacy policies, visit usps.com/privacypolicy.

**CONFIDENTIAL
DOCUMENT FORM***Case Records Public Access Policy of the Unified Judicial System of Pennsylvania*

204 Pa. Code § 213.81

www.pacourts.us/public-recordsJASON VERIABO

(Party name as displayed in case caption)

GD-20-012346

Docket/Case No.

Vs.

ALLY FINANCIAL, INC.

(Party name as displayed in case caption)

Common Pleas Allegheny

Court

This form is associated with the pleading titled COMPLAINT, dated February 11, 2022.

Pursuant to the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania*, the Confidential Document Form shall accompany a filing where a confidential document is required by law, ordered by the court, or is otherwise necessary to effect the disposition of a matter. This form shall be accessible to the public, however the documents attached shall not be publicly accessible, except as ordered by a court. The documents attached will be available to the parties, counsel of record, the court, and the custodian.

Please only attach documents necessary for the purposes of this case. Complete the entire form and check all that apply. This form and any additional pages must be served on all unrepresented parties and counsel of record.

Type of Confidential Document	Paragraph, page, etc. where the confidential document is referenced in the filing:
<input checked="" type="checkbox"/> Financial Source Documents	
<input type="checkbox"/> Tax Returns and schedules	
<input type="checkbox"/> W-2 forms and schedules including 1099 forms or similar documents	
<input type="checkbox"/> Wage stubs, earning statements, or other similar documents	
<input type="checkbox"/> Credit card statements	
<input checked="" type="checkbox"/> Financial institution statements (e.g., investment/bank statements)	Exhibit F
<input type="checkbox"/> Check registers	
<input type="checkbox"/> Checks or equivalent	
<input type="checkbox"/> Loan application documents	
<input type="checkbox"/> Minors' educational records	
<input type="checkbox"/> Medical/Psychological records	
<input type="checkbox"/> Children and Youth Services' records	
<input type="checkbox"/> Marital Property Inventory and Pre-Trial Statement as provided in Pa.R.C.P. No. 1920.33	
<input type="checkbox"/> Income and Expense Statement as provided in Pa.R.C.P. No. 1910.27(c)	
<input type="checkbox"/> Agreements between the parties as used in 23 Pa.C.S. §3105	

I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

/s/ Joshua P. Ward

Signature of Attorney or Unrepresented Party

02/11/22

Date

Name: Joshua P. WardAttorney Number: (if applicable) 320347Address: 201 South Highland Avenue, Suite 201Telephone: (412) 545-3015Pittsburgh, PA 15206Email: jward@jpward.com

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

JASON VERIABO,

Plaintiff,

vs.

ALLY FINANCIAL, INC.,

Defendant.

CIVIL DIVISION

ELECTRONICALLY FILED

Case No. GD-20-012346

**CONFIDENTIAL EXHIBIT TO
COMPLAINT IN CIVIL
ACTION EXHIBIT F**

Filed on Behalf of Plaintiff:

Jason Veriabo

Counsel of Record for this Party:

J.P. WARD & ASSOCIATES, LLC

Joshua P. Ward

Pa. I.D. No. 320347

John V. Moore

Pa. I.D. No. 87333

J.P. Ward & Associates, LLC

The Rubicon Building

201 South Highland Avenue

Suite 201

Pittsburgh, PA 15206

Telephone: (412) 545-3015

Fax No.: (412) 540-3399

E-mail: jward@jpward.com

EXHIBIT F

File Number: 365087202
Date Issued: 10/12/2019

Page 4 of 5

Your Investigation Results

INVESTIGATION RESULTS - DISPUTED INFORMATION UPDATED AND OTHER INFORMATION UPDATED: A change was made to the item(s) based on your dispute and other information has also changed.

ALLY FINANCIAL #2092426**** (P.O. BOX 380901, BLOOMINGTON, MN 55438, (888) 925-2559)

We investigated the information you disputed and updated: **High Balance; Past Due; Terms; Remarks; Rating; Payment Received.** Here is how this item appears on your credit report following our investigation.

Date Opened:	07/08/2016	Balance:	\$0	Pay Status:	>Account paid in Full; was a
Responsibility:	Individual Account	Date Updated:	05/25/2017		Charge-off<
Account Type:	Installment Account	Payment Received:	03/22/2017 (\$0)	Terms:	\$0 per month, paid Monthly
Loan Type:	AUTOMOBILE	Last Payment Made:	03/22/2017		for 72 months
		High Balance:	\$14,100	Date Closed:	05/25/2017
		Original Charge-off:	\$7,731		>Maximum Delinquency of 60 days in
					04/2017<

Remarks: DISP INVG COMP-CONSUM DISAGRS; >SETTLED-LESS THAN FULL BLNC<; >PAID IN FULL/WAS A CHARGE OFF<

Estimated month and year that this item will be removed: 01/2024

	04/2017	03/2017	02/2017	01/2017	12/2016	11/2016	10/2016	09/2016
Rating	60	30	30	OK	OK	30	OK	OK

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